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5 Attorneys for Defendant
ROWLAND MARCUS ANDRADE

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ROWLAND MARCUS ANDRADE,
15 Defendant.

Case No. 3:20-CR-00249-RS

**DECLARATION OF JOHN M. PIERCE
IN SUPPORT OF NOTICE OF
RELATED UNITED STATES
SUPREME COURT CASE**

Judge: Hon. Richard Seeborg

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18 EXHIBIT 2
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21 DECLARATION OF JOHN M. PIERCE IN SUPPORT OF NOTICE OF RELATED UNITED
22 STATES SUPREME COURT CASE

23 I John M. Pierce declare as follows:

- 24 1. Counsel recently obtained evidence that, on June 26, 2019, the IRS Criminal
25 Investigation Division authorized a Bank Secrecy Act (“BSA”) civil investigation into
26 Andrade and his affiliated entity.
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28 2. Counsel hasn’t been paid and doesn’t have the resources to further investigate these

1 matters and therefore rely on the government, specifically AUSA Christiaan
2 Highsmith to investigate these matters AND to make the proper disclosures to the
3 defendant and to the court.

4 I declare under penalty of perjury under the laws of the United States that the forefoing is
5 true and correct. Executed on January 6, 2025.
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8
9 /s/ John M. Pierce
John M. Pierce _____
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